

1 WENDY MEDURA KRINCEK, ESQ., Bar # 6417
2 HILARY B. MUCKLEROY, ESQ., Bar # 9632
3 LITTLER MENDELSON, P.C.
4 3960 Howard Hughes Parkway
5 Suite 300
6 Las Vegas, NV 89169-5937
7 Telephone: 702.862.8800
8 Fax No.: 702.862.8811
9 Email: wkrincek@littler.com
10 Email: hmuckleroy@littler.com

11 Attorneys for Defendants
12 UHS OF DELAWARE, INC.
13 and UHS OF SPRING MOUNTAIN, INC.

14 UNITED STATES DISTRICT COURT

15 DISTRICT OF NEVADA

16 VILIKA VANDEN BRINK,
17 Plaintiff,

18 vs.

19 UHS OF DELAWARE, INC., a Delaware
20 Corporation, UHS OF SPRING
21 MOUNTAIN, INC., A Delaware
22 Corporation, DOES 1-50 and ROES 1-50,

23 Defendants.

24 Case No. 2:19-cv-00008-MMD-PAL

25 **STIPULATION AND ORDER TO DISMISS
26 ENTIRE ACTION WITHOUT PREJUDICE**

27 Plaintiff, VILIKA VANDEN BRINK and Defendants, UHS OF DELAWARE, INC. AND
28 UHS OF SPRING MOUNTAIN, INC. (collectively “Defendants”) by and through their respective
counsel of record, with reference to the following:

29 WHEREAS, on or about February 21, 2017, Plaintiff completed an employment application
30 containing an agreement to arbitrate all disputes arising out of or relating to Plaintiff’s employment,
31 or termination of employment (“the Arbitration Agreement”);

32 WHEREAS, on or about January 2, 2019, Plaintiff filed a Complaint in the United States
33 District Court, District of Nevada, alleging violation of the Americans with Disabilities Act, 42
34 U.S.C §12101, et seq.

35 WHEREAS, Plaintiff and Defendant agree that the claims should be arbitrated;

1 IT IS HEREBY STIPULATED by and between Plaintiff and Defendants and
2 ORDERED, as follows:

3 1. The Action, in its entirety, shall be submitted to binding arbitration pursuant to the
4 terms of the Arbitration Agreement;

5 2. That the filing of the Complaint in this matter on January 2, 2019 shall constitute
6 Plaintiff's timely demand for arbitration pursuant to the terms of the Arbitration Agreement; and

7 3. All proceedings in this Action shall be dismissed.

8 Each party shall bear its own costs and fees for the claims dismissed by this Stipulation
9 and Order.

10 Dated: March 6, 2019

Dated: March 6, 2019

11 Respectfully submitted,

Respectfully submitted,

13 /s/ Eran S. Forster, Esq.
14 DANIEL R. WATKINS, ESQ.
ERAN S. FORSTER, ESQ.
WATKINS & LETOFSKY, LLP

16 Attorneys for Plaintiff
VILIKA VANDEN BRINK

13 /s/ Hilary B. Muckleroy, Esq.
14 WENDY MEDURA KRINCEK, ESQ.
HILARY B. MUCKLEROY, ESQ.
LITTLER MENDELSON, P.C.

16 Attorneys for Defendants
UHS OF DELAWARE, INC.
and UHS OF SPRING MOUNTAIN, INC.

18 **ORDER**

19 **IT IS SO ORDERED.**

20 Dated: _____, 2019.

24 _____
UNITED STATES DISTRICT COURT JUDGE